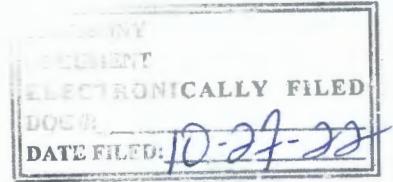


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October 26, 2022

VIA ECF

The Honorable Lewis A. Kaplan
United State District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

**Re: *Terra Towers Corp. et al. v. Telecom Business Solution, LLC., et al.*,
Case No. 1:22-cv-07301-LAK**

Dear Judge Kaplan:

I write on behalf of Petitioners — Terra Towers Corp., TBS Management S.A., and DT Holdings, Inc. — to request leave to file a reply memorandum exceeding the page limits set forth in Your Honor's Individual Practices.

On October 12, 2022, Respondents filed a memorandum of law in opposition to the Amended Petition (ECF Doc. No. 27). Although 35 pages in length, Respondents' memorandum includes 36 single-spaced footnotes in 10-point type. Most of these footnotes are lengthy and contain substantive argument. Had Respondents included that argument in the body of their brief, double-spaced and in 12-point type, their brief would have been closer to 45 pages in length.

We therefore respectfully ask the Court to permit Petitioners to file a reply memorandum of no more than 15 pages in length. Petitioners' reply brief is currently due on November 4, 2022.

Respectfully submitted,

/s/ Michael B. Smith
Michael B. Smith

cc: all Counsel of Record (via ECF)

SO ORDERED
Granted
LEWIS A. KAPLAN, USDJ
10/27/22